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October 17, 2022

Sent Via PDF E-mail

Chambers of Judge Paul S Diamond@paed.uscourts.gov

The Honorable Paul S. Diamond
U.S. DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA
U.S. Courthouse
601 Market Street, Room 14614
Courtroom 14-A
Philadelphia, PA 19106

Re: Tawainna Anderson, et al. v. TikTok, Inc., et al.
U.S.D.C., Eastern District of PA, Docket No. 2:22-cv-01849-PD

Dear Judge Diamond:

Defendants TikTok Inc. and ByteDance Inc. (together, “TikTok”) have received Plaintiff’s October 17, 2022 motion seeking leave to amend the Complaint in this matter. *See* ECF No. 33. TikTok opposes Plaintiff’s request for amendment, which comes two months after briefing closed on TikTok’s motion to dismiss the Complaint (*see* ECF No. 12, which is currently under consideration by the Court), while TikTok’s motion to stay is currently pending decision by the Court (*see* ECF No. 32), and while the case is currently in the conditional transfer process as part of the pending MDL proceedings.¹ TikTok respectfully requests that the Court withhold ruling on Plaintiff’s motion for leave through the close of business on Wednesday, October 19, 2022 to allow TikTok to file its opposition to Plaintiff’s motion.

Respectfully,

CAMPBELL CONROY & O'NEIL, P.C.

/s/ Joseph E. O'Neil
Joseph E. O'Neil, Esquire

JEO/kaw

cc: All Counsel via e-mail

¹ On October 11, this case was added by the Judicial Panel on Multidistrict Litigation to Conditional Transfer Order 1 and is now pending transfer to *In re: Social Media Adolescent Addiction/Personal Injury Product Liability Litigation*, MDL No. 3047 (N.D. Cal.). *See* Ex. A. Plaintiff’s deadline to oppose transfer is October 18, 2022.